

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION**

Ann F. Beckett,

Plaintiff,

v.

Charles Christopher Ruff and Sysco
Columbia, LLC,

Defendants.

Case No. 9:21-cv-03427-DCN
(formerly C/A No. 2021CP2500299)

NOTICE OF REMOVAL

TO: THE UNITED STATES COURT:

Defendant, Sysco Columbia, LLC, would respectfully show this honorable Court in support of its Notice of Removal that:

1. The Summons and Complaint in this action were filed on September 16, 2021 in the Court of Common Pleas for Hampton County, South Carolina. Attached for the Court are copies of Plaintiff's Summons and Complaint. The Complaint is the first pleading served upon the Defendant Sysco Columbia, LLC in this action and service was affected on September 20, 2021. The Complaint has not been served on Defendant Charles Christopher Ruff. Therefore, removal is timely under 28 U.S.C. §1446(b).

2. The United States District Court has jurisdiction over this action pursuant to 28 U.S.C. §1332. The Plaintiff is a resident and citizen of the State of South Carolina. Defendant Sysco Columbia, LLC is incorporated in the State of Delaware and has its principal place of business in the State of Delaware. The action has been brought by the Plaintiff against the Defendant for the alleged accident which occurred in Hampton County, South Carolina.

3. Venue is proper in this matter in the Beaufort Division of this Court in accordance with 28 U.S.C. §1441(a).

4. Upon information and belief, the amount in controversy in this matter exceeds \$75,000.00 as Plaintiff alleges suffering serious, severe and permanent injuries, mental anguish, monies for medical care and treatment (past and future), and loss of enjoyment of life.

5. Defendant has filed no pleadings in this action with the Court of Common Pleas for the State of South Carolina in response to this Complaint; however, Defendant's Answer to the Plaintiff's Complaint is filed herewith contemporaneously.

6. Defendant has furnished a copy of this Notice of Removal to the Clerk of Court for Hampton County.

Respectfully submitted,

SWEENEY, WINGATE & BARROW, P.A.

s/ Mark S. Barrow

Mark S. Barrow, Fed. I.D. No. 1220

Aaron J. Hayes, Fed. I.D. No. 11196

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ATTORNEYS FOR THE DEFENDANT

SYSCO COLUMBIA, LLC

Columbia, South Carolina

October 20, 2021